



5. Venue is proper in this District pursuant to 28 U.S.C. § 1391.

**FACTUAL BACKGROUND**

6. On or about January 27, 2014, Michael and Hawkeye entered into a confidential contract, a copy of which will be marked as Exhibit A and filed under seal. The provisions of Exhibit A are incorporated herein by reference.

7. An affidavit of Terry Baker will also be filed under seal, and marked as Exhibit B. The provisions of Exhibit B are incorporated herein by reference.

**BREACH OF CONTRACT**

8. Michael has complied with all of the terms of the contract.

9. Hawkeye is in breach of the contract.

10. Hawkeye's breach of the contract will cause Michael to suffer substantial harm.

Under the present circumstances, such harm will be irreparable.

**WHEREFORE**, Michael respectfully requests (a) preliminary and permanent injunctive relief enjoining Hawkeye from breaching the contract, (b) judgment against Hawkeye and damages in an amount sufficient to compensate Michael for Hawkeye's breach, (c) interest and costs, and (d) all other relief deemed appropriate under the circumstances.

/s/ Mark A. Schultheis  
Mark A. Schultheis AT0007133  
Ryan W. Leemkuil AT0011129  
--of the firm of  
NYEMASTER GOODE, P.C.  
700 Walnut Street, Suite 1600  
Des Moines, Iowa 50309-3899  
Telephone: (515) 283-3100  
Fax: (515) 283-8045  
Email: [maschultheis@nyemaster.com](mailto:maschultheis@nyemaster.com)  
[rleemkuil@nyemaster.com](mailto:rleemkuil@nyemaster.com)  
**ATTORNEYS FOR PLAINTIFF**